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9           *Attorneys for Plaintiff and the Proposed Class*

10           **UNITED STATES DISTRICT COURT**  
11           **CENTRAL DISTRICT OF CALIFORNIA**

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13           TINAMARIE BARRALES, individually  
14           and on behalf of all others similarly  
15           situated,

16    Plaintiff,  
17    v.  
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19           NEW CHAPTER, INC.,

20    Defendant.

21    Case No. 2:25-cv-01171-HDV-KES  
CLASS ACTION

22    **STIPULATION AND REQUEST  
FOR REMOTE APPEARANCE ON  
DEFENDANT'S MOTION TO  
DISMISS COMPLAINT,  
SCHEDULED FOR MAY 15, 2025**

23    Date: May 15, 2025  
24    Time: 10:00 a.m.  
Ctrm: 5B  
Judge: Hon. Hernán D. Vera

25    Action Filed: Feb. 11, 2025  
26    Trial Date: None Set

## **STIPULATION AND REQUEST**

It is hereby stipulated and agreed by and between the undersigned parties, subject to approval and entry by the Court, that:

1. Defendant New Chapter Inc.’s (“Defendant”) Motion to Dismiss Plaintiff’s Complaint (ECF No. 15) is set for hearing on May 15, 2025 at 10:00 a.m., in Courtroom 5B of the United States District Court for the Central District of California, located at 350 West First Street, Los Angeles, California 90012.

2. On May 6, 2025, the Parties, through counsel, met and conferred pursuant to L.R. 7-3 regarding the upcoming hearing on Defendant's motion to dismiss, including, subject to the Court's approval, permitting a remote appearance for Plaintiff's counsel for the reasons discussed below.

3. Plaintiff represents good cause exists for Plaintiff's counsel to appear remotely at the motion to dismiss hearing, as Plaintiff's counsel, Lilach H. Klein, who will be appearing for the hearing, is in her third trimester of pregnancy and will be 37 weeks pregnant on May 15, 2025. Given her current medical condition, it is not advisable for Plaintiff's counsel to travel outside of Sacramento County where she resides. *See* Declaration of Lilach H. Klein, filed concurrently herewith.

4. To accommodate Plaintiff's counsel's medical condition, and, subject to the Court's approval, the Parties agree and stipulate to allow Plaintiff's counsel to appear remotely at the hearing on Defendant's motion to dismiss complaint.

**IT IS SO STIPULATED AND AGREED.**

DATED: May 7, 2025

Respectfully submitted,

/s/ *Lilach H. Klein*

LILACH H. KLEIN

*Counsel for Plaintiff and the Proposed Class*

1 DATED: May 7, 2025

2 Respectfully submitted,

3 /s/ Daniel H. Leigh

4 DANIEL H. LEIGH

5 Counsel for Defendant

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**ATTESTATION PURSUANT TO CIVIL L.R. 5-4.3.4**

The undersigned filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: May 7, 2025

/s/ Lilach H. Klein

Lilach H. Klein